

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TERRELL REID,

Defendant.

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Cause No. 4:19-CR-00327-RWS/NAB

**DEFENDANT'S MOTION TO CONTINUE
POST-HEARING BRIEFING**

COMES NOW Defendant, Terrell Reid, by and through counsel, and hereby moves this Court to continue the post-hearing briefing deadlines. In support thereof, Defendant states as follows:

1. Defendant filed pretrial motions and an evidentiary hearing was had on July 16, 2020.
2. This Court ordered that Defendant's Post Hearing Brief was due three weeks from the date that the transcript was filed.
3. On July 30, 2020, the Government filed a Notice of Intent to not use Defendant's post-*Miranda* statements in its case-in-chief and moved to deny Defendant's Motion to Suppress Post-*Miranda* Statements. (Doc. 179).
4. The transcript was filed on August 7, 2020. (Doc. 181).
5. On August 12, 2020, Defendant filed a Motion for Leave to File Additional Pretrial Motion. (Doc. 184).
6. On August 20, 2020, the Government filed a Response to Defendant's Motion. (Doc. 189).
7. On August 20, 2020, Defendant filed a Reply to the Government's Response. (Doc. 191).

8. On August 20, 2020, the Government filed a Sur-Reply. (Doc. 193).
9. This Court set Defendant's Motion (Doc. 184) for hearing on September 3, 2020. (Doc. 196).
10. Defendant's post-hearing brief was due on August 28, 2020.

WHEREFORE, Defendant requests this Court the post-hearing briefing schedule until after the scheduled hearing on September 3, 2020 in order to fully brief the pre-trial issues in this matter.

Respectfully submitted,

MUHLENKAMP & BERNSEN,
ATTORNEYS AT LAW, LLC

By: /s/ Tory D. Bernsen
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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties of record.

/s/ Tory D. Bernsen
TORY D. BERNSEN